



HELEN F. DALTON & ASSOCIATES, P.C.
ATTORNEYS AT LAW

80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415
T. (718) 263-9591 | F. (718) 263-9598

May 6, 2024

To (via ECF):

The Honorable Sarah L. Cave, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1670
New York, NY 10007

Re: **Zamora et al v. JGL Restaurant Corp. et al**
Civil Docket No.: 1:22-cv-05739-ALC-SLC

Dear Judge Cave:

Our office represents Plaintiff in the above-referenced matter, and we submit this letter jointly with Counsel for Defendants pursuant to this Court's Order dated November 13, 2023 to certify the close of all discovery in this matter [Dkt. No. 24].

To date, discovery, namely depositions, remains outstanding to date. The parties completed paper discovery on this matter, including responding to respective interrogatories and requests for document production. Currently, the parties are scheduled for a settlement conference with Your Honor on May 14, 2024 via videoconference at 2:30p.m. In light of this, the parties respectfully request sixty (60) days from the date of the settlement conference, or July 12, 2024, to complete the outstanding depositions in the event the parties do not settle this matter.

We thank the Court for its kind consideration in this matter and remain available to provide any further information.

Respectfully submitted,

/s/

Katelyn M. Schillaci, Esq.

CC (via email & ECF):

Eunon Jason Mizrahi
Levin-Epstein & Associates, P.C.
60 East 42nd Street
Suite 4700
New York, NY 10165
Email: jason@levinepstein.com

Joshua Levin-Epstein
Levin-Epstein & Associates, P.C.
60 East 42nd Street
Suite 4700

New York, NY 10165

Email: Joshua@levinepstein.com